



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

DEC 22 2004

Michael P. Crooks, Esq.
Peterson, Johnson & Murray, S.C.
131 West Wilson Street, Suite 200
Madison, WI 53703

RE: MUR 5446
Welch for Wisconsin and John J. Hiller, as treasurer
Citizens for Welch and Richard J. Rathjen, as treasurer
Senator Robert T. Welch
Jeanne Welch

Dear Mr. Crooks:

The Federal Election Commission previously notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. On December 10, 2004, the Federal Election Commission found reason to believe that your clients, Welch for Wisconsin and John J. Hiller, as treasurer; Citizens for Welch and Richard J. Rathjen, as treasurer; and Senator Robert T. Welch, violated 11 C.F.R. § 110.3(d). However, after considering the circumstances of this matter, the Commission also determined to take no further action other than to send a letter of admonishment and closed its file.

In addition, the Commission found no reason to believe that Robert T. Welch; Welch for Wisconsin and John J. Hiller, as treasurer; Citizens for Welch and Richard J. Rathjen, as treasurer; Senator Robert T. Welch; and Jeanne Welch, violated 2 U.S.C. § 441i. A copy of the dispositive General Counsel's Report is enclosed for your information.

The Commission reminds your clients that transfer from a candidate's campaign committee for a nonfederal election to his principal campaign committee for a federal election is a violation of the Act. 11 C.F.R. § 110.3(d). You should take steps to ensure that this activity does not occur in the future.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003).

If you have any questions, please contact Kathleen M. Guith, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "Bradley A. Smith". The signature is fluid and cursive, with a large initial "B" and a stylized "S".

Bradley A. Smith
Chairman

Enclosure
General Counsel's Report